

Exhibit 145:

Jamie Selden-Manor Declaration

DECLARATION OF JAMI SELDEN-MANOR

I, Jami Selden-Manor, (“Declarant”), states as follows:

1. I am employed by the Michigan State Police as a Departmental Manager. I have held this position since March 19, 2023.

2. This Declaration is based upon my personal knowledge.

3. If sworn as a witness, I can testify competently as to the facts stated herein.

4. I reviewed the Report of German Marquez Alcala, James J. Prescott and R. Karl Hanson Re: Class Data in *Does III v Whitmer*, bates range Does III - 00002379-2430. This will be referred to as “the Report.”

5. Since March 24, 2021, 5,696 registrants that are defined in the Report as the In Community Group, have not verified their address. Verified means reporting in person to a registering authority annually, semi-annually, or quarterly where the registrant is domiciled or residing.

6. As of July 6, 2023, there are 5,424 registrants reporting at least one internet identifier.

7. The group that is referred to in the Report as the “Left Michigan Group,” includes anyone who has ever had reporting obligations in Michigan since the inception of the registry in 1995, but left Michigan. For example, if someone with an out-of-state conviction worked in Michigan for two months years ago and they reported to a law enforcement agency in Michigan, that person is included in the “Left Michigan Group.” Or if someone was convicted in Michigan, and shortly after their initial registration they moved out of state and they have not returned, that person is included in the “Left Michigan Group.” In the overwhelming majority of cases, after someone has left Michigan, we do not receive updated information about them. Some of the individuals in the Left Michigan Group may have passed away or may be incarcerated in another state.

8. It is unclear why the Total Registrants (as defined in the Report) number includes the approximately 9,500 individuals that have left Michigan. Those individuals, while living out of state, do not have reporting requirements in Michigan. The information from those individuals is not viewable by the public, nor is it viewable by members of law enforcement. It is maintained for administrative purposes in the Sex Offender Registry so if one of those individuals moves back to Michigan, the information does not need to be re-entered.

9. The Report indicates that there are 295 people with Michigan convictions for MCL 750.349, 750.349b or 750.350. (Report, pg 38-39.) As of July 6, 2023, there are 174 individuals that have been convicted of one of those offenses. There are 160 of those individuals that have one of those convictions plus another concurrent conviction for criminal sexual conduct. (e.g., kidnapping and CSC 2nd degree.) As a result of the *Lymon* decision, 152 individuals have been removed from the registry. As of July 6, 2023, there are 14 individuals that are on the registry with only a conviction for MCL 750.349, 750.349b or 750.350, and no other concurrent criminal sexual conduct conviction. The 14 individuals that remain on the registry are required based on a prosecuting attorney decision to have the individuals continue their registration obligations.

10. The Report indicates that the victim age data does not appear to be reliable. (Report, pg 27-28.) The data cited in Table 7 of the Report is inconsistent with the data available in the Sex Offender Registry system. See attachment A, which is an Excel Spreadsheet that contains information pulled from the system regarding the victim's age. The system includes a field for the age of the victim(s) if the age is known. The field is entitled "VictimAge." There are various reasons why the victim age may not be entered in the system.

As of June 29, 2023, the system contained a total of 63,033 convictions where a victim age could be entered. Of those 63,033 convictions, the "VictimAge" field contained age entries for 37,035 crimes. As of June 29, 2023, there were 25,998 crimes where there was no entry in the "VictimAge" field. There are 1,206 victims listed as being aged 99 because of the previous system. The number 99 has been a placeholder for when the victim age is unknown, and the registrant has other offenses that require tier III registration. Further, if information is provided to the SOR unit that the victim is an adult, but the exact age of the victim is unknown, the number 99 may be entered. For victims in the system where "VictimAge" is entered, 30,015 of the victims are aged 17 or under, which is more than 81% of the victims where the "VictimAge" field is populated.

11. The Report states that the recidivism rate is around 9%, with 4,572 registrants with a subsequent criminal sexual conduct conviction. (Report, pg 13.) The Report defines recidivism as "being convicted of a new sexual offense after being caught (convicted/registered) for a previous sexual offense." (Report, pg 12.) However, elsewhere in the Report it defines "offense free" to mean whether a person has recidivated "(i.e., has been caught by the criminal justice system.)" (Report, pg 17.) It's unclear how the Report, which is apparently based off the data from the Sex Offender Registry, can address whether offenders are "offense free" because whether someone commits another sex offense is not something that is tracked in the Registry. (i.e., it does not track whether someone is accused of another sex offense, it does not track whether someone is charged with another sex offense, and

obviously it cannot track whether another sex crime is actually committed by a registrant.) The Registry contains information regarding subsequent criminal sexual conduct convictions.

As of June 29, 2023, there are 5,308 registrants with more than one criminal sexual conduct conviction. Our numbers do not attempt to “cluster” offenses as clustering is explained in the Report. (Report, pg 12.)

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

A handwritten signature in blue ink, appearing to read 'Jami Selden-Manor', with a stylized, cursive script.

Jami Selden-Manor

Dated: July 7, 2023

VictimAge	Total
	25,998
1	66
2	128
3	389
4	745
5	1,054
6	1,176
7	1,318
8	1,541
9	1,530
10	1,542
11	1,863
12	3,015
13	3,757
14	4,802
15	4,528
16	1,496
17	1,065
18	518
19	464
20	377
21	354
22	302
23	276
24	240
25	246
26	212
27	179
28	189
29	145
30	154
31	130
32	126
33	127
34	105
35	107
36	99
37	113
38	101
39	85
40	87
41	76
42	76
43	61
44	52

VictimAge	Total
46	53
47	55
48	65
49	40
50	58
51	38
52	48
53	34
54	24
55	28
56	34
57	34
58	18
59	20
60	17
61	25
62	14
63	8
64	11
65	9
66	6
67	7
68	10
69	11
70	5
71	8
72	3
73	4
74	7
75	4
76	3
77	3
78	3
79	3
80	2
81	1
82	1
83	2
84	3
85	3
86	3
87	5
88	4
89	-

VictimAge	Total
91	1
92	-
93	-
94	-
95	-
96	1
97	-
98	-
99	1,206
Total	63,033
Total with victim age entered	37,035

45	76
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90	1
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